



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

07-29-2021

Mr. Roberto Puga, P.G.
Principal of Project Navigator Ltd, solely in its capacity as Trustee for
HOVENSA Environmental Response Trust
1 Estate Hope
Christiansted, Virgin Islands 00820

Ms. Carey Guilbeau
HOVENSA Environmental Response Trust
Trust Representative & Technical Program Manager
PMB 245
6002 Diamond Ruby, Suite 3
Christiansted, VI 00820-5226

Re: Review of the March 2, 2021 Second Semiannual 2020 Corrective Action Status Report, Former
HOVENSA, L.L.C. Site, St. Croix, U.S. Virgin Islands, EPA
RCRA I.D. No: VID980536080

Dear Mr. Puga and Ms. Guilbeau:

The U.S. Environmental Protection Agency (EPA) has reviewed the March 2, 2021 Corrective Action Status Report (CAS), for the former HOVENSA LLC facility, located in St. Croix, US Virgin Islands. This CAS details RCRA corrective action activities conducted at the facility during the second half (July through December) of 2020. EPA's review indicates that for the most part, the HOVENSA ERT (ERT) is continuing to implement the monitoring and corrective action as required under the Part B Permit and the 2009 Draft Corrective Measures Implementation (CMI) Workplan. The enclosed comments identify the need to thoroughly identify leaks and repairs occurring during each reporting period, as well as the source of any new contamination. The comments also note the need to update the Quality Assurance Project Plan. EPA had transmitted draft comments to the HOVENSA ERT via email dated July 20, 2021. There are no substantial changes to the draft comments.

If you have any questions regarding these comments, I can be contacted via telephone at (212) 637-4181.

Sincerely,

A handwritten signature in cursive script that reads "Carol A. Stein".

Carol A. Stein, PE, MBA
Environmental Engineer
EPA Region 2
Land & Redevelopment Programs Branch
New York, NY 10007-1866

Enclosure

cc: Austin Callwood, Director, VIDPNR-DEP via email
Brad Martin, Toeroek via email